

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION

ANGELA ANDERSON, Personally,
and on behalf of the WRONGFUL DEATH BENEFICIARIES
of PRINCESS ANDERSON, Deceased

PLAINTIFF

v.

No. 3:12-CV-92-DMB-SAA

MARSHALL COUNTY, MISSISSIPPI, and
BAPTIST MEMORIAL HOSPITAL - DESOTO

DEFENDANTS

PLAINTIFF'S SUPPLEMENTAL DISCLOSURE OF EXPERT OPINIONS

COMES NOW Plaintiff, by and through counsel, pursuant to Rule 26 of Federal Rules of Civil Procedure hereby designates the following opinions and testimony of Defendant Marshall County's expert, Thomas Fowlkes, M.D., in the area of emergency medicine only (Plaintiff specifically is not recognizing any expertise of this witness outside the area of emergency room medicine.):

1. Dr. Fowlkes' opinion that the decedent Princess Anderson was not suffering from acute psychosis while at the emergency room at Baptist Memorial - DeSoto Hospital on February 7 and 8. See Fowlkes' deposition, transcript 1, page 40, lines 1-8.
2. Baptist Memorial Hospital - DeSoto did not comply with the governing standards of care with regard to their evaluation, care and treatment of Princess Anderson. See Fowlkes' deposition, transcript 1, page 60, line 17 through page 61, line 8.
3. Princess Anderson was not medically clear for discharge from Baptist Memorial Hospital-DeSoto, when she was discharged on February 8, 2011. See Fowlkes' deposition, transcript 1, page 64, line 8 through page 65, line 18.



4. Princess Anderson should have been admitted to the hospital for followup tests related to potential ectopic pregnancy. See Fowlkes' deposition, transcript 1, page 66, line 7 through page 67, line 23. See also page 68, line 13-24.

5. Princess Anderson's symptoms that were being treated with Ativan at Baptist Memorial Hospital-DeSoto would be expected to reoccur if the medicine was not sent with her to the jail for administration. See Fowlkes' deposition, transcript 1, page 75, line 13 through page 76, line 4.

6. Princess Anderson's mental state was of acute delirium caused by drug ingestion. See Fowlkes' deposition, transcript 1, page 76, lines 5-23. Further, acute delirium is a medical problem which the patient needed a medical intensive care unit, not a psychiatric ward. Fowlkes' deposition, transcript 1, page 78, page 7-11.

7. Princess Anderson was in the early stages of dehydration while at Baptist Memorial Hospital-DeSoto. See Fowlkes' deposition, transcript 1, page 108, line 7-18.

This, the 18th day of March, 2014.

Respectfully submitted,

CHAPMAN, LEWIS & SWAN, PLLC
Attorneys for Plaintiff
501 First Street
P.O. Box 428
Clarksdale, MS 38614
(662) 627-4105 Phone
(662) 621-2538 Facsimile

By: s/Daniel M. Czamanske, Jr.
MSB No. 10812
dan@chapman-lewis-swan.com

CERTIFICATE OF SERVICE

I, Daniel M. Czamanske, Jr., do hereby certify that I have this day electronically filed a true and correct copy of the above and foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

David D. O'Donnell
dodonnell@claytonodonnell.com
Attorney for Defendants Marshall County, MS
and Kenny Dickerson

Ray Hill
rhill@claytonodonnell.com
Attorney for Defendants Marshall County, MS
and Kenny Dickerson

Kate Mauldin Embry
kembry@dunbardavis.com
Attorney for Defendant BMH-Desoto, Inc.

Walter Alan Davis
waltdavis@dunbardavis.com
Attorney for Defendant BMH-Desoto, Inc.

This, the 18th day of March, 2014.

s/Daniel M. Czamanske, Jr.
DANIEL M. CZAMANSKE, JR.